

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
STEWARD HEALTH CARE SYSTEM	§	Case No. 24-90213 (CML)
LLC, et al.,	§	
	§	(Jointly Administered)
Debtors.¹	§	
	§	

**AGENDA OF MATTERS SET FOR HYBRID
HEARING ON AUGUST 22, 2024 AT 1:00 P.M. (CENTRAL TIME)**

A HEARING WILL BE CONDUCTED ON THIS MATTER ON AUGUST 22, 2024 AT 1:00 P.M. (CENTRAL TIME) IN COURTROOM 401, 4TH FLOOR, 515 RUSK AVENUE, HOUSTON, TX 77002. YOU MAY PARTICIPATE IN THE HEARING IN-PERSON OR BY AN AUDIO AND VIDEO CONNECTION.

AUDIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT 832-917-1510. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE LOPEZ'S CONFERENCE ROOM NUMBER IS 590153. VIDEO COMMUNICATION WILL BE BY USE OF THE GOTOMEETING PLATFORM. CONNECT VIA THE FREE GOTOMEETING APPLICATION OR CLICK THE LINK ON JUDGE LOPEZ'S HOME PAGE. THE MEETING CODE IS "JUDGELOPEZ". CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING.

HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF BOTH ELECTRONIC AND IN-PERSON HEARINGS. TO MAKE YOUR APPEARANCE, CLICK THE "ELECTRONIC APPEARANCE" LINK ON JUDGE LOPEZ'S HOME PAGE. SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK "SUBMIT" TO COMPLETE YOUR APPEARANCE.

Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), hereby file this Agenda of Matters Set for Hearing on August 22, 2024 at 1:00 p.m. (Central Time) before the Honorable Christopher M. Lopez.

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

I. CONTESTED MATTER

1. Dr. Erik Beyer, M.D.'s Motion for Payment of 2023 Productivity Bonus (Docket No. 1598)

Status: This matter is going forward.

Responses:

- A. Objection of Debtors to Dr. Erik Beyer, M.D.'s Motion for Payment of 2023 Productivity Bonus (Docket No. 2073)
- B. Joinder of the Official Committee of Unsecured Creditors to Objection of Debtors to Dr. Erik Beyer, M.D.'s Motion for Payment of 2023 Productivity Bonus (Docket No. 2075)

Related Documents:

- A. Re-Notice of Hearing on Dr. Erik Beyer, M.D.'s Motion for Payment of 2023 Productivity Bonus – D.E. #1598 (Docket No. 1722)
- B. Dr. Erik Beyer, M.D.'s Notice of Filing His Declaration in Support of Motion for Payment of His 2023 Productivity Bonus (Docket No. 2046)
- C. Dr. Erik Beyer, M.D.'s Witness and Exhibit List for Hearing on August 22, 2024 (Docket No. 2047)
- D. Dr. Erik Beyer, M.D.'s Notice of No Objection to Motion for Payment of His 2023 Productivity Bonus (D.E. 1598) (Docket No. 2048)
- E. The Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearing on August 22, 2024 (Docket No. 2052)
- F. Debtors' Witness and Exhibit List for Hearing on August 22, 2024 (Docket No. 2056)
- G. Debtors' Amended Witness and Exhibit List for Hearing on August 22, 2024 (Docket No. 2102)

II. EMERGENCY MATTER

2. **Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 281)**

Status: This matter is going forward.

Responses:

- A. Medical Properties Trust, Inc.'s (I) Objection to Notice of Designation of Stalking Horse Bidder for Certain of the Debtors' Florida Hospitals and (II) Emergency Cross-Motion for Entry of an Order Compelling the Debtors to Comply with Court-Approved Global Bidding Procedures (Docket No. 2037)
- B. Spyglass Hill Property, LLC's Objection to Notice of Designation of Stalking Horse Bidder for Certain of Debtors' Florida Hospitals (Docket No. 2042)
- C. FILO Secured Parties' Objection and Reservation of Rights with Respect to Hospital Sales (Docket No. 2043)

Related Documents:

- A. Declaration of Toby King in Support of Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 426)
- B. Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 626)
- C. Notice of Sale, Global Bidding Procedures, Auction, and Sale Hearing (Docket No. 689)

- D. Notice of Designation of Stalking Horse Bidder for Certain of the Debtors' Florida Hospitals (Docket No. 1991)
- E. Notice of Dates and Deadlines Under the Bidding Procedures Order (Docket No. 1993)
- F. The Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearing on August 22, 2024 (Docket No. 2052)
- G. Debtors' Witness and Exhibit List for Hearing on August 22, 2024 (Docket No. 2056)
- H. Notice of Emergency Hearing on Bid Protections Order for Space Coast Hospitals (Docket No. 2057)
- I. Declaration of Toby King in Support of the Debtors' Proposed Order Approving Stalking Horse Bid Protections for Orlando Health (Docket No. 2076)
- J. Medical Properties Trust, Inc.'s Witness and Exhibit List for Hearing on August 22, 2024 (Docket No. 2079)
- K. Debtors' Amended Witness and Exhibit List for Hearing on August 22, 2024 (Docket No. 2102)

III. UNCONTESTED MATTER

- 3. Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1711)**

Status: The Debtors have filed a certificate of no objection at docket number 2071.

Responses:

- A. Limited Objection of the Official Committee of Unsecured Creditors to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1743)

- B. Statement and Reservation of Rights of 1199SEIU United Healthcare Workers East to the Debtors' Emergency Motion for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1752)
- C. Massachusetts' Statement in Response to (I) the Emergency Motion by Steward Approving Funding, Hospital Closures, and Related Relief [ECF No. 1711] and (II) the Emergency Motion by Steward to Reject Master Lease II, and Related Relief [ECF No. 1712] (Docket No. 1753)
- D. Massachusetts Nurses Association's Combined Objection to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure Of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief [Docket No. 1711], and Response to Emergency Motion of Debtors for Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection with Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief [Docket No. 1712], Reservation of Rights and Request For Related Relief (Docket No. 1757)
- E. Response of the Roman Catholic Archbishop of Boston, a Corporation Sole, to the Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1758)
- F. Objection and Response of MPT and Master Lease II Lessors to the Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1759)

- G. Statement of Suzanne Koenig, as Patient Care Ombudsman, in Response to the Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts For The Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1764)
- H. Objection of Commonwealth of Pennsylvania to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts for The Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1767)
- I. Objection and Reservation of Rights to Emergency Motion for Entry of an Order (I) Approving (A) Funding For The Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure Of Carney Hospital And Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1768)
- J. Joinder of the Florida Agency for Health Care Administration in the Objection of Commonwealth of Pennsylvania to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1772)

Related Documents:

- K. Declaration of John R. Castellano in Support of Emergency Motions of Debtors for Entry of Orders (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; (II) Authorizing Rejection of Master Lease II Agreements in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators; and (III) Granting Related Relief (Docket No. 1713)

- L. Declaration of Toby King in Support of Emergency Motions of Debtors for Entry of Orders (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; (II) Authorizing Rejection of Master Lease II Agreements in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators; and (III) Granting Related Relief (Docket No. 1714)
- M. Declaration of James Moloney in Support of Emergency Motion of Debtors for Entry of Orders (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; (II) Authorizing Rejection of Master Lease II Agreements in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators; and (III) Granting Related Relief (Docket No. 1717)
- N. Debtors' Witness and Exhibit List for Hearing on July 31, 2024 (Docket No. 1727)
- O. Notice of Deposition of John R. Castellano (Docket No. 1728)
- P. The Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearing on July 31, 2024 (Docket No. 1747)
- Q. Medical Properties Trust, Inc.'s Witness and Exhibit List for Hearing on July 31, 2024 (Docket No. 1750)
- R. Declaration of Dana Simon in Support of Massachusetts Nurses Association's Combined Objection to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1711), and Response to Emergency Motion of Debtors for Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection with Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief (Docket No. 1712), Reservation of Rights and Request for Related Relief (Docket No. 1761)

- S. Declaration of Audra Sprague in Support of Massachusetts Nurses Association's Combined Objection to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1711), and Response to Emergency Motion of Debtors for Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection with Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief (Docket No. 1712) (Docket No. 1774)
- T. Supplement to Declaration of Dana Simon in Support of Massachusetts Nurses Association's Combined Objection to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1711), and Response to Emergency Motion of Debtors for Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection with Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief (Docket No. 1712), Reservation of Rights and Request for Related Relief (Docket No. 1775)
- U. Notice of Filing of Revised Proposed Order (I) Approving (A) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (B) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1779)
- V. Notice of Filing of Further Revised Proposed Order (I) Approving (A) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (B) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1791)
- W. Notice of Continued Hearing (Docket No. 1792)
- X. Notice of Filing of Further Revised Proposed Order (I) Approving (A) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (B) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1807)
- Y. Notice of Filing of Revised Proposed Order Approving Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals and Granting Related Relief (Docket No. 1843)

- Z. Notice of Filing of Further Revised Proposed Order Approving Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals and Granting Related Relief (Docket No. 1848)
 - AA. Order (I) Approving (A) the Closure of Carney Hospital and Nashoba Valley Medical Center on a Final Basis, and (B) Procedures Related to Facility Closures on an Interim Basis; and (II) Granting Related Relief (Docket No. 1850)
 - BB. Order Approving Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals and Granting Related Relief (Docket No. 1855)
 - CC. Notice of Hearing (Docket No. 1964)
 - DD. Certificate of No Objection Regarding Emergency Motion of Debtors for Entry of an Order (I) Approving Procedures Related to Facility Closures and (II) Granting Related Relief (Docket No. 2071)

Dated: August 21, 2024
Houston, Texas

/s/ Clifford W. Carlson
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*Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on August 21, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Clifford W. Carlson
Clifford W. Carlson